Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Advancing Broadband Availability through	)	WC Docket No. 12-23
Digital Literacy Training	)	

COMMENTS OF NEW AMERICA FOUNDATION'S OPEN TECHNOLOGY
INITIATIVE AND ACCESS HUMBOLDT

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I. INTRODUCTION

New America Foundation's Open Technology Initiative and Access Humboldt ("Commenters") recognize the tremendous importance of digital literacy training as means of increasing meaningful broadband adoption, particularly for low-income communities. Commenters therefore applaud the Commission's efforts to incorporate a digital literacy training component into the Universal Service Fund. Nonetheless, we have concerns about how the proposed program may be developed and administered.

Commenters do not oppose using savings within the Lifeline Fund for a digital literacy training program. However, we do have concerns about creating strain on the Fund's ability to support voice and broadband service if existing Lifeline funding were used for such a program, particularly given the Commission's plan, outlined in the Order, to constrain the size of the fund within the next two years. In addition, we encourage the Commission to structure a digital literacy training program in a way that does not direct support to Eligible Telecommunications Carriers ("ETCs"). Many other organizations and entities such as libraries, schools, community media centers and other community anchor institutions are more appropriate recipients and much better situated to provide digital literacy training. Furthermore, ETCs already have ample sources of support within the Universal Service Fund for infrastructure and service, including the newly-minted broadband pilot program.

While Commenters understand the goal articulated by the Commission of increasing the *number* of digital literacy efforts, they urge the Commission to include existing digital literacy efforts among those eligible for program support. Although BTOP projects and others are already receiving funding that supports digital literacy efforts, the funding for those projects is time-limited, and many of those digital literacy efforts could be greatly enhanced with increased

support. In addition, BTOP programs in particular contain a large amount of community based knowledge assets relating to digital literacy and its effect on broadband adoption, and those projects could provide valuable insight for the development of future efforts. Including them in a Commission-led digital literacy training program could greatly enhance the program's success.

Finally, Commenters ask the Commission to consider and articulate reasonable expectations for its digital literacy training program and include sustainability and accountability components as it develops the program. Merely increasing the number of time-limited digital literacy training efforts will not in itself solve the problem of digital literacy among low-income populations. Careful attention must be paid to creating programs that are sustainable, with mechanisms to ensure accountability of fund recipients, and program evaluation to instruct future efforts.

II. THE PROPOSED DIGITAL LITERACY PROGRAM SHOULD NOT COMPROMISE THE COMMISSION'S ABILITY TO SUBSIDIZE BROADBAND SERVICE FOR LOW-INCOME HOUSEHOLDS AND SHOULD NOT DIRECT FUNDING TO ELIGIBLE TELECOMMUNICATIONS CARRIERS.

The Commission seeks comment on "how to fund digital literacy training without increasing the overall size of the Universal Service Fund," and asks whether "digital literacy training could be realized by measures we adopt today to eliminate waste, fraud, and abuse in the Lifeline program, or by savings realized in high-cost support?"[1] While Commenters do not object to the notion that fund savings could be leveraged for digital literacy training, Commenters do have concerns about dedicating existing Lifeline funds to digital literacy

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[1] In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket Nos. 11-42, 03-109, 12-23; CC Docket No. 96-45, *Report and Order and Further Notice of Proposed Rulemaking* (rel. Feb 6, 2012) ¶ 433 ("Order and FNPRM").

training, given that the Commission is also proposing to limit the Fund's size through a constrained budget going forward.[2]

Further, Commenters oppose funding Eligible Telecommunications Carriers ("ETCs") to perform digital literacy training. Funding ETCs with public dollars to carry out digital literacy training is highly inappropriate both in terms of their limited education and community engagement expertise as well as the potential to create significant conflicts of interest. Thus, the Commission should structure the program in such a way that directs funding to libraries, schools, community media centers and other community anchor institutions, and not direct funding to ETCs.[3]

We have found in our work with community partners on BTOP projects that effective broadband adoption efforts require ongoing relationship building and presence within communities. The Commission's suggestion that "such training could be provided by ETC employees in public locations such as libraries or schools"[4] is incompatible with our understanding of successful adoption and digital literacy efforts. Libraries, schools, and community centers *themselves* are best situated to provide digital literacy training and are more

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[2] *See* Order and FNPRM ¶¶ 355-360. NAF also notes that the Commission's proposed Lifeline Broadband Pilot Program includes a mere $25 million in funding (Order and FNPRM ¶ 324). Given that the pilot program is geared toward actual broadband service, rather than training, we are concerned about constraining the Lifeline Fund's ability to meet the Commission's stated goal of "removing barriers to infrastructure investment" by addressing the "lack of affordability of broadband Internet access services" (Order and FNPRM ¶ 332).

[3] The Commission seems to suggest that, on one hand, if the digital literacy training program is housed within the Lifeline Fund, then, under their interpretation of the Telecommunications Act, funding might be limited to ETCs; on the other hand, it seems to suggest that if the program were housed within the E-rate program, schools and libraries would be directly eligible for support (Order and FNPRM ¶ 428).

[4] Order and FNPRM ¶ 428.

likely to be viewed as trustworthy by community members. [5] Establishing trust is critical when encouraging non-adopters, many of whom are at the most basic level of technological literacy and who have thus far refrained from adopting due concerns about privacy and security online, to begin exploring online.[6] Digital literacy is also most effective when based on personal relationships. Consider the experience of Dr. Delores Leonard, a resident of Detroit who works with the city's Kemeny Reading Corner Computer Center[7] to bridge the generational side of the digital divide:

> "'In teaching, you take people from the known to the unknown," said Leonard, a retired educator. "I'm starting with the known, talking about family and the kinds of things we want to give to our families and our children. Eventually I'll have to get them to the other equipment like the scanner by getting them to preserve their family history. A lot of community members here are in their 80's and some of them are not accepting of new ideas but some will. Those who will may be able to help the others by bringing their pictures in and scanning them."[8]

Leonard's approach reflects her longstanding involvement in her neighborhood, and the Kemeny Center's presence in the community as a trusted facility for area residents. Bringing ETC employees into low-income neighborhoods for temporary digital literacy training programs

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[5] *See* Kistine Carolan, "Maine Librarians Bridge the Digital Job Divide," OTI Blog *available at* http://oti.newamerica.net/blogposts/2012/maine_librarians_bridge_the_digital_job_divide-63832 "The libraries are a logical meeting place for people to learn digital literacy skills and get the skills they need to get a job or even participate in life today with computers," said McKenney.

[6] *Id.* "The presence of librarians […] is also critical for community members' digital literacy training. "Many of [the participants] have never uploaded a document before and it's a scary experience without having someone to hand-hold them through it the first time," said McKenney."

[7] The Kemeny Reading Corner Computer Center is a community computer lab in Detroit's 58217 neighborhood. For more information about the center and the community, *see* "Kemeny Reading Corner Celebrates Grand Opening of Computer Center," Detroit Digital Justice Coalition (Nov. 10, 2011) *available at* http://detroitdjc.org/2011/11/10/kemeny-reading-corner-becomes-second-ddjc-computer-center-to-come-online/.

[8] "DDJC Computer Labs Build Intergenerational Relationships," Detroit Digital Justice Coalition (Nov. 10, 2011) *available at* http://detroitdjc.org/2011/11/10/ddjc-computer-labs-helping-to-bridge-generational-digital-divide-in-detroit/.

ignores the deeply ingrained community relationships that make digital literacy programs for these neighborhoods successful.

In addition, supporting digital literacy through a subsidy to ETCs constitutes an inappropriate conflict of interest that would potentially result in the use of public money to subsidize marketing campaigns for ETCs. Particularly with no proposed oversight over digital literacy training for fund recipients, ETCs would have every incentive to use the subsidy and training efforts to market the benefits of their own service offerings, while establishing goodwill among community members under the guise of generosity and charitableness. ETCs can already engage in such public relations efforts, but they should do so without explicit support from public funds. A funding mechanism that flows directly to ETCs would also undermine the ability of the entities housing the training (in the Commission's example, libraries and schools) to provide necessary input into training program design and structure, given those entities' lack of access to the program's purse strings.

ETCs also have numerous other mechanisms for funding under the Universal Service Fund more generally – for rural infrastructure, for communications services for low-income populations, and even now for a pilot program for broadband service. The Commission has cited the constraints of §254(e) and §214(e) as reasons that support within portions of the fund must flow exclusively to ETCs.[9] Commenters have gone to great lengths to propose various mechanisms by which the Commission could get around these statutory constraints[10], including

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[9] Order and FNPRM ¶ 334; s*ee also* In the Matter of Connect America Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208, *Report and Order and Further Notice of Proposed Rulemaking* (rel. Nov. 18, 2011) ¶ 62-64 (noting the Commission's authority to transition the High-Cost Fund to broadband via provisioning of broadband service over an ETCs infrastructure).

[10] Comments of New America Foundation, WC Docket Nos. 11-42, 03-109; CC Docket No. 96-45 (April 21, 2011) at 2-5; Reply Comments of New America Foundation, WC Docket Nos. 11-

reclassifying broadband as a telecommunications service.[11] Nonetheless, the Commission has continued to limit recipients of most of the fund's support to ETCs, to the exclusion of other entities who could provide similar services.

In this case limiting funding to ETCs is more problematic, as this program provides training, rather than infrastructure or direct access to a communications service. ETCs have no specific expertise in formal digital literacy training that would make a subsidy to them for such a service appropriate or even logical. Other entities, like schools, libraries, community media centers and other community anchor institutions, do have such expertise and therefore make sense as potential funded entities. If the Commission is serious about "address[ing] the barrier that lack of digital literacy creates to increased broadband adoption among low-income Americans,"[12] it should structure a digital literacy training program in such a way that allows those entities best situated to provide digital literacy training to have access to support.

III. THE COMMISSION SHOULD NOT EXCLUDE EXISTING DIGITAL LITERACY PROGRAMS FROM DIGITAL LITERACY TRAINING SUPPORT.

As the Commission itself notes, "BTOP's Sustainable Broadband Adoption and Public Computing Center programs are providing needed funding" but that, such "funding will end by

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42, 03-109; CC Docket No. 96-45 (May 25, 2011) at 2-3; Comments of New America Foundation, Consumers Union, and Media Access Project, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208 (April 18, 2011) at 5-9; Reply Comments of New America Foundation, Consumers Union, Media Access Project, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208 (May 23, 2011) at 2-7; Comments of New America Foundation, Public Knowledge, and Benton Foundation, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208 (Jan. 18, 2012) at 2-5.

[11] *E.g.* Reply Comments of Center for Media Justice, Consumers Union, Media Access Project, and New America Foundation, GN Docket No.10-127 (Aug. 12, 2012).

[12] Order and FNPRM ¶ 416.

2013."[13] The Commission goes on to propose "to limit funds to entities that do _not_ already offer formal digital literacy training services so that USF does not displace existing funding sources for such training, whether derived from public or private sources," and further asks, "whether [it] should limit funding only to 'communities' that are not already served by digital literacy programs, such as BTOP-funded programs designed to teach digital literacy skills."[14] Excluding existing digital literacy programs from eligibility for the Commission's proposed Digital Literacy Training initiative would effectively create a new batch of time-limited training programs with no clear path to sustainability.

While Commenters appreciate the Commission's goal of spreading digital literacy training to cover a broader swath of communities across the United States than those in which a BTOP-funded or other digital literacy program is currently present, they note that the Commission could structure its program to increase the impact and reach of existing programs while concurrently leveraging the experiences of those programs to instruct new initiatives. Thus, rather than viewing communities in which digital literacy programs are currently present as "already served," the Commission could instead treat them as potential leaders in this area who are equipped with valuable training and adoption experience that may, in some instances, benefit from additional funding to sustain their digital literacy efforts once existing funding sources run out, or to enhance existing informal digital literacy efforts with more formalized training. A sustainable program could serve as both a model for current and future efforts and a component of a larger network of digital literacy efforts nation-wide.

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[13] Order and FNPRM ¶ 420.

[14] Order and FNPRM ¶ 430.

IV. COMMENTERS DO NOT OBJECT TO THE COMMISSION'S PROPOSED FUNDING AND DURATION AMOUNTS FOR THE DIGITAL LITERACY TRAINING PROGRAM BUT ADVISE THAT REASONABLE AND CLEAR EXPECTATIONS ABOUT SUSTAINABILITY AND ACCOUNTABILITY SHOULD BE CONSIDERED AND ARTICULATED.

In response to the Commission's proposed timeline and funding allocation – four years and $50 million, respectively – Commenters respond that both the duration and amount may be sufficient to make a measurable improvement in digital literacy, but also that the Commission should consider how they will structure, document and measure the effectiveness of the program to improve digital literacy in communities. To that end, our previous suggestion to include BTOP-funded and other digital literacy programs among the pool of eligible applicants can help facilitate information and resource sharing among funded projects. In addition, a clear articulation by the Commission of the programs specific objectives and expectations will make it easier to ascertain whether the program is ultimately successful or not.

As we have previously commented in this docket with respect to the Commission's proposed pilot program, establishing clear, measurable goals at the onset of program design combined with effective program evaluation facilitates Commission oversight and ensures that funds are being used effectively by recipients.[15] Structured well, the data could also be combined with data being collected from BTOP-funded projects to create a comprehensive study on digital literacy more generally. Moreover, that data can be used to better understand sustainability issues – for example, measuring whether additional funding streams for previously funded projects is successful at increasing project sustainability as compared to projects receiving funding from only a single source.

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[15] *E.g.* Comments of Benton Foundation, New America Foundation, Public Knowledge, United Church of Christ, OC Inc., The Center for Rural Strategies, Access Humboldt, and Deep Tech WC Docket Nos. 11-42, 03-109; CC Docket No. 96-45, Appendix A (Aug. 24, 2011).

V. CONCLUSION

Access without literacy will not solve the digital divide. Commenters strongly support Commission-led efforts to increase digital literacy, particularly for low-income populations. However, such efforts must be structured in a manner that provides support to the entities best situated to deliver meaningful training, and they must be administered with clear expectations and measures to provide accountability. For the reasons outlined above, Commenters ask the Commission to structure the program to support non-ETCs, including schools, libraries, community media centers and other community anchor institutions; include participation and funding support for existing digital literacy efforts; and finally to establish clear program expectations and effective program evaluation to understand the program's impact on digital literacy and adoption.

Respectfully Submitted,

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